



Re: Ohio Rubber Company
#02-43-0301

Mr. Edward Grant
Ohio Rubber Company
3911 Ben Hur Avenue
Willoughby, Ohio 44094

May 23, 1983

Dear Mr. Grant:

On April 29, 1983, I conducted a reinspection of the Ohio Rubber Company facility located at 3911 Ben Hur Avenue, Willoughby, Ohio, to determine compliance with violations noted during the February 1, 1983, Interim Status Standards inspection. You, Mr. Jack McLellan, and Mr. Paul Robbins represented the Ohio Rubber Company during the reinspection.

During the reinspection we discussed the applicability of the RCRA regulations with regards to the ignitable waste, generated by your facility, from the pretreatment of process washwater. This waste, which consists primarily of xylol bottoms mixed with water, is stored at your facility in a 2,200 gallon underground tank. It is sold back to the original manufacturer, which is not a permitted facility, for reuse. As we stated before, this waste is a sludge as defined by 40 CFR 260.10.

Your facility will need to add tank storage (S02) for this waste stream to your Hazardous Waste Installation and Operation permit, include tank inspections on your inspection schedule and logs, record the quantities in storage on your operating records, add the tank to your Closure Plan, and dispose of the waste at a permitted facility.

With the possible exception of this waste stream, this reinspection indicates that this facility is in general compliance with the applicable Ohio Hazardous Waste regulations OAC 3745-50 through 3745-58 and Federal Hazardous Waste regulations 40 CFR 260 through 265.

Please feel free to contact our office or Ms. Kathy Homer, U.S. EPA - Region V, at (312) 886-7435, if you have any questions.

Yours truly,

Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

RB:km

cc: Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V

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